

Richard M. Heimann (State Bar No. 063607)
rheimann@lchb.com
Nimish R. Desai (State Bar No. 244953)
ndesai@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ELOISE ACKISS, ET AL,
Plaintiffs,
v.
GENERAL MOTORS LLC, et al.,
Defendant.

Case No. 4:21-cv-06338-JST

**JOINT STIPULATION EXTENDING
PLAINTIFFS' TIME TO OPPOSE
DEFENDANTS' MOTION TO DISMISS
AND DEFENDANTS' TIME TO REPLY
TO PLAINTIFFS' OPPOSITION**

Judge: Honorable Jon S. Tigar
Courtroom: 6

Pursuant to Civil Local Rule 6-1(b), Plaintiff Eloise Ackiss, et al, ("Plaintiffs") and Defendants General Motors LLC, General Motors Holdings LLC, and General Motors Company ("Defendants") (Plaintiffs and Defendants are referred to collectively as the "Parties"), by and through their respective undersigned counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs served Defendants with the Summons and Class Action Complaint ("Complaint") and an answer or response to the Complaint was initially due on September 13, 2021;

WHEREAS, Defendants and Plaintiffs stipulated to an additional 60 days for Defendants' answer or response to Plaintiff's Complaint, which was entered by the Court on September 10, 2021, setting the deadline for Defendants to answer or otherwise respond to the Complaint as November 12, 2021;

WHEREAS, Plaintiffs filed an Amended Class Action Complaint on October 26, 2021 (“Amended Complaint”), and the parties stipulated that Defendants could have an additional 56 days to answer or respond given the complexity of the allegations;

WHEREAS, Defendants filed a Motion to Dismiss the Amended Class Action Complaint on January 7, 2022;

WHEREAS, due to the complexity of the arguments in Defendants’ Motion to Dismiss, Plaintiffs have requested and Defendants have consented to an additional 46 days for Plaintiffs to oppose Defendants’ Motion to Dismiss;

WHEREAS, Defendants have requested and Plaintiffs have consented to an additional 23 days for Defendants to reply to Plaintiffs’ opposition;

WHEREAS, this briefing schedule will not alter the date of any event or any deadline already fixed by Court order;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their respective counsel, that Plaintiffs shall respond to Defendants’ Motion to Dismiss by March 8, 2022 and Defendants shall reply to Plaintiffs’ opposition by April 7, 2022.

I. Nimish R. Desai, hereby attest that each of the Signatories have concurred in the filing of this document, which shall serve in lieu of their signatures on the document.

Dated: January 21, 2022

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Nimish R. Desai
Nimish R. Desai (CA Bar # 244953)

Attorney for Plaintiffs

Dated: January 21, 2022

DYKEMA GOSSETT LLP

By: /s/ Derek S. Whitefield

Derek S. Whitefield
John M. Thomas

Attorneys for Defendants

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated _____, 2022

HONORABLE JON S. TIGAR
United States District Judge